

EXHIBIT 7

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JUSTIN GUY, individually on behalf
of himself and others similarly situated,

Plaintiff,

v.

ABSOPURE WATER COMPANY, LLC,
a domestic limited liability company,

Defendant.

Case No.: 20-cv-12734

Hon. Mark A. Goldsmith

**OPT-IN PLAINTIFF GARY JOHNSON, JR.'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO DEFENDANT ABSOPURE WATER COMPANY, LLC**

Opt-in Plaintiff, Gary Johnson, Jr. ("Opt-in Plaintiff"), pursuant to Rule 34 of the Federal Rules of Civil Procedure, requests that Defendant, ABSOPURE WATER COMPANY, LLC, a Domestic Limited Liability Company ("Defendant"), respond to this Request for Production in accordance with the Definitions and Instructions provided herein.

INSTRUCTIONS AND DEFINITIONS

A. In responding to these requests, produce all documents and things that are in your custody, possession, or control, including documents and things in the custody, possession, or control of your attorneys, investigators for your attorneys, independent accountants, agents, or any person acting on behalf of or in concert with you or with any of these individuals, and not merely documents and things from your own personal files.

B. If you cannot respond to any of the following requests in full, respond as completely as possible, specifying the nature (if known) and reasons why you are unable to respond in full, and provide whatever information you have concerning the unprovided things,

Opt-in Plaintiff's employment with Defendant, including all company and personnel manuals, employee handbooks, and memos that the Opt-in Plaintiff was provided by Defendant.

RESPONSE:

2. All time records (i.e., all records maintained by Defendant evidencing the time that the Opt-in Plaintiff worked for Defendant), which includes the time that the Opt-in Plaintiff arrived at work, was on break, was at lunch, or departed from work.

RESPONSE:

3. For each pay period of the Opt-in Plaintiff's employment from October 8, 2017 to present, produce all paychecks, pay reports, paystubs, computer reports or printout, or other documents evidencing the amount paid to the Opt-in Plaintiff, the number of hours worked by the Opt-in Plaintiff, all deduction from the Opt-in Plaintiff's compensation and the periods for which the Opt-in Plaintiff was absent from work.

RESPONSE:

4. All W-2s and/or 1099s prepared by Defendant for the Opt-in Plaintiff from 2017 to present.

RESPONSE:

5. To the extent not previously produced, all documents that identify the method of compensation owed to the Opt-in Plaintiff, which includes entitlement to bonuses, from October 8, 2017 to the present.

RESPONSE:

6. To the extent it was not previously produced, all documents that support Defendant's argument that the Opt-in Plaintiff is exempt from the overtime provisions of the FLSA.

RESPONSE:

7. To the extent it was not previously produced, all documents that support Defendant's contention that the Opt-in Plaintiff is not similarly-situated to Plaintiff.

RESPONSE:

8. Produce any opinion or opinions, and Curriculum Vitae or resume, of any person that Defendant has consulted with or whom Defendant intends to or expect to call as an expert witness at the time of trial of this action, including for each person:

- a. Any report or summary that the person prepared;
- b. Each and every document, exhibit or visual aid that Defendants intends to use in conjunction with or offer into evidence through each expert witness; and
- c. Produce a copy of each and every document acquired, developed, reviewed or relied upon by the expert in anticipation of this litigation and/or in anticipation of the trial of this action.

RESPONSE:

Dated: April 10, 2023

Respectfully submitted,

/s/ Michael N. Hanna
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PROOF OF SERVICE

The undersigned certifies that on April 10, 2023, the foregoing document was served via e-mail upon all attorneys of record.

/s/ Michael Hanna
Michael N. Hanna, Esq.